

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Crim. Act. No. 99-80-JJF

JOHN E. TROTTER,

Defendant.


**JOINT MOTION TO CONTINUE HEARING ON REVOCATION OF DEFENDANT'S
SUPERVISED RELEASE**

NOW COMES the parties, the United States of America, by its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Shannon Thee Hanson, Assistant United States Attorney, and Edson Bostic, counsel for defendant John E. Trotter, and respectfully request a continuance in the hearing on the petition for revocation of Mr. Trotter's supervised release from its currently scheduled time of February 14, 2007 at 1:00 p.m to March 1, 2007 at 11:30 a.m. In support of this motion, counsel avers as follows: The facts underlying this alleged violation of supervised release stem from charges brought against the defendant in Delaware state court. Defense counsel needs additional time to confer with Mr. Trotter's counsel on the state charges to determine whether a full supervised release hearing will be required or whether the state charges will be resolved prior to any federal hearing on revocation of supervised release. The government does not oppose the request for continuance until March 1, 2007.

Defense counsel has authorized the government to sign this joint motion on his behalf.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

BY: 
Shannon Thee Hanson
Assistant United States Attorney

Dated: February 12, 2007

IT IS this _____ day of February hereby ORDERED that the hearing on the petition for revocation of supervised release in this matter, currently scheduled for February 14, 2007 at 1:00 p.m., is CANCELLED and is rescheduled for March 1, 2007 at 11:30 a.m., for the reasons set forth in the parties' joint motion.

The Honorable Joseph J. Farnan, Jr.
United States District Judge

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UNITED STATES OF AMERICA,

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V.

JOHN E. TROTTER,


Defendant.

Case No. 99-80-JJF

CERTIFICATE OF SERVICE

I, Marie Steel, Legal Assistant in the Office of the United States Attorney for the District of Delaware, hereby certify that on the 12th day of February, 2007, I caused to be filed a Joint Motion to Continue Hearing On Revocation of Defendant's Supervised Release with the Clerk of Court. I further certify that a copy of the foregoing was mailed via First Class Mail to counsel of record as follows:

Edson Bostic, Esquire
Federal Public Defender
704 King Street, Suite 110
Wilmington, DE 19801


Marie Steel
Legal Assistant